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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

WILLIAM BERRY, JR,

Plaintiff,

vs.

AARGON AGENCY, INC; PLUSFOUR, INC;  
QUANTUM COLLECTIONS; AND  
RICHLAND HOLDINGS, INC DBA  
ACCOUNTCORP OF SOUTHERN NEVADA,

Defendants.

Case No.: 2:20-cv-02144-APG-EJY

**JOINT MOTION FOR EXTENSION OF  
TIME FOR PLAINTIFF TO FILE  
RESPONSE TO DEFENDANT PLUSFOUR,  
INC'S MOTION TO DISMISS**

(Second Request)

WILLIAM BERRY, JR ("Plaintiff") and Defendant PLUSFOUR, INC. ("Plusfour"), collectively the "Parties", hereby jointly submit this motion ("Joint Motion") for an extension of time for Plaintiff to file a response to Plusfour's Motion to Dismiss or in the Alternative Motion for Summary Judgment ("Motion to Dismiss") to **February 3, 2021**. Additionally, Plusfour's reply brief, if any, shall be likewise extended for two weeks to **February 17, 2021**. The Motion to Dismiss was filed on December 16, 2020 and appears on the docket as ECF #8. This is the Parties' second request for an extension of time.

The reason for the second request is two-fold: (1) Plaintiff needs additional time to fully respond to the issues and arguments raised in the Motion to Dismiss; and (2) Plaintiff and Defendant Plusfour had

1 been in negotiations in good faith efforts to resolve the matter, but were unable to reach a resolution.  
 2 This is Parties' second request for an extension and this Joint Motion has not been submitted for the  
 3 purpose of delay or other impermissible purpose. Plusfour will not be prejudiced by the delay and has  
 4 agreed to the extensions of time. Additionally, the requested extensions do not prejudice or directly affect  
 5 the other Defendants in this case. Accordingly, it is requested that the Court grant the extension of time  
 6 to respond to the Motion to Dismiss to February 2, 2021 and any reply brief to February 17, 2021.  
 7

8 Dated: January 29, 2021.

9 Submitted By:

No Opposition:

10 /s/ Shawn W. Miller

/s/ Garrett R. Chase

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*Attorneys for Defendant Plusfour, Inc.*

*Attorneys for Plaintiff*

15  
 16 **ORDER GRANTING EXTENSION OF TIME**

17 IT IS SO ORDERED.

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 19   
 UNITED STATES DISTRICT JUDGE

20  
 21 Dated: February 2, 2021  
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